

## REMARKS

In accordance with the foregoing, claims 1, 2, 4, and 8-15 are amended. No new matter is presented in any of the foregoing and, accordingly, approval and entry of the amended claims are respectfully requested.

Claims 1-5 and 7-15 are pending and under consideration.

## CLAIM AMENDMENTS

Claims 1 and 2 are amended to recite a multi-channel processing control device, using claim 1 as an example, including "accepting a plurality of process requests from a plurality of channels as communication means between a user and call center, and determining whether any of the plurality of process requests from the plurality of channels are real-time process requests needing processing in real-time. . . , non-real-time processing administrating means for changing processing requests among processing requests determined to be the non-real-time processing requests to the real-time processing requests when data relating to clients as processing objects is predetermined client data, and for administrating other non-real-time processing requests with priority levels therefore, . . . (and) allocating process requests determined to be real-time process requests to processing terminals that are currently available among a plurality of processing terminals connected to a plurality of channels capable of a real-time process." Support for the amendment is found, for example, on pages 15-16 of the specification.

Claims 4 and 11 are amended to respectively clarify a method and a computer network "wherein said incoming tasks and outgoing tasks . . . arising from channels connected to Web agents."

Claims 8-10 are amended herein to respectively recite a computer-readable medium on which is recorded a computer program for a multi-channel control method capable of being executed by a computer and a computer network, using claim 8 as an example, including "determining whether any of a plurality of process requests . . . (and) allocating those real-time process requests to processing terminals that are currently available among a plurality of processing terminals connected to a plurality of channels."

Dependent claims 12-15 are amended to correspond to respective amended parent claims.

No new matter is presented in any of the foregoing and, accordingly, approval and entry of the amended claims are respectfully requested.

**ITEM 3: REJECTION UNDER 35 U.S.C. §112, SECOND PARAGRAPH**

In item 3, the Examiner rejects claims 1-5 and 7-15 under 35 U.S.C. §112, second paragraph, as being indefinite. The Examiner contends, for example, that the "use of 'channel' here is unclear." (Action at page 2).

Claims 1-2, 4, and 8-15 are amended herein so as to address the Examiner's concern. Claim 3 being dependent on claim 2, amended herein. Claim 5 being dependent on claim 4, amended herein. Claim 7 being dependent on claims 4 or 5, both amended herein.

Applicants submit that claims 1-5 and 7-15 comply with 35 U.S.C. §112, second paragraph and request withdrawal of the rejection.

**ITEMS 4-7: REJECTION UNDER 35 U.S.C. §101**

In items 4-7, the Examiner rejects claims 8-15 under 35 U.S.C. §101 contending they are directed to nonstatutory subject matter.

Claims 8-15 are amended herein to address the Examiner's concern. Applicants submit that claims 8-15, as amended herein, comply with 35 U.S.C. §101 and request withdrawal of the rejection.

**ITEM 32: REJECTION UNDER 35 U.S.C. §103(a)**

In item 32 the Examiner indicates that:

Haigh does not support an anticipatory-type rejection by not describing feature of real-time and non-real time determination of process requests.

(Action at page 11.)

However, claims 1-5 and 7-15 are rejected under 35 U.S.C. §103(a) as being unpatentable over Haigh in view of Naoki or in view of newly-cited art Flockhart et al. (JP 10-304073).

The rejections are traversed

**Recited Features Not Taught By Cited Art**

Independent claims 1 and 2, both as amended herein, respectively recite a multi-channel processing control device and a method, using claim 1 as an example, including "accepting a plurality of process requests from a plurality of channels as communication means between a user and call center, and determining whether any of the plurality of process requests from the plurality of channels are real-time process requests needing processing in real-time. . . , non-real-time processing administrating means for changing processing requests among processing requests determined to be the non-real-time processing requests to the real-time processing requests when data relating to clients as processing objects is predetermined client data, and for administrating other non-real-time processing requests with priority levels

therefore, . . . (and) allocating process requests determined to be real-time process requests to processing terminals that are currently available among a plurality of processing terminals connected to a plurality of channels capable of a real-time process."

Independent claims 4, 10 and 11 respectively recite a method, a medium, and a network, including "allocating the processing terminal handled by said dual-duty operator to either incoming tasks or outgoing tasks based on a current status of the processing terminals handled by the operators, wherein said incoming tasks and outgoing tasks include both real-time and non-real-time process requests arising from channels connected to, in addition to the processing terminals handled by said operators, Web agents handling process requests generated by Internet web servers, e-mail agents handling process requests generated by e-mail servers, and automatic voice response devices automatically processing incoming signals from public lines."

Independent claims 8 and 9 respectively recite a computer-readable medium and a network including "determining whether any of a plurality of process requests generated from a plurality of channels are real-time process requests needing processing in real-time, or non-real-time process requests not needing processing in real-time, the determining based on services in a queue category; allocating those real-time process requests to processing terminals that are currently available among a plurality of processing terminals connected to a plurality of channels capable of a real-time process; and administrating said non-real-time process request as well as a priority level therefor."

According to aspects of the present invention, the recited features make it is possible to respond quickly to process requests determined to be real-time process requests, and to allocate the process requests determined to be non-real-time process requests to the most appropriate processing terminals after registering them to a queue. Thus, it is possible to process requests efficiently.

Also, even if process requests are once determined to be non-real-time process requests, but the data of users as processing objects is predetermined user data, it is possible to process the requests preferentially by reallocating real-time process requests.

As an example, according to an aspect of the present invention, process requests are determined to be non-real-time process requests and are registered to a delayed queue with their priority when e-mail is received. Preferential service and emergency contact can be provided, for example, by sending a queue process as real-time process requests when the sender of the E-mail is a specific mailing address which is pre-registered as a valued client (for example, a person requiring assistance in using a phone).

Applicants submit that features recited by claims are not taught by the cited art, alone or in combination.

1) Independent claims 1-2 and 8-9 recite, using claim 1 as an example, the determining of whether any of the plurality of process requests are "real-time, or non-real-time process requests" is "based on services in a queue category." Such a determination based on services is not taught by the cited art.

2) Further none of the cited art, including Flockhart, alone or in an *arugendo* combination recites a method, device or network that "among non-real-time process requests, process requests are changed from non-real-time to real-time when predetermined users are processing objects" in addition to "a determination of process requests as real-time or non-real-time based on properties of a channel and a queue category."

3) The Examiner contends that Haigh teaches requests are based on services in a queue since Haigh discusses:

different queues with different services, one queue with sub-queues for different services or one queue with different identified services.

(Action at page 11.)

The Examiner also incorrectly contends that Flockhart teaches:

requests are based on services in a queue (service-time objectives to different types of calls or call queues for different types of calls. Service-time objectives for a video call and a voice-only call represent differentiation between real-time and non-real time calls. Also, service-time objectives represent a determination of process request based on services in a queue category, abstract).

(Action at pages 6-7.)

Applicants respectfully submit that none of the art, alone or in combination teaches a determining based on services in a queue category. Rather, Haigh merely teaches (see, for example, col. 2, starting at line 29):

(i)t is understood that other known queue processing techniques may be used, such a Last-In, First-Out (LIFO) ordering of transactions, selective processing of transactions in a queue, and queue processing based on, for example, the current loading or length of the queue.

Flockhart merely teaches (see, page 13, lines 14-15) that "each queue 21 holds calls of different priority. Alternatively, each set 20 comprises only one call queue 21 in which calls of different priority are queued in their order or priority."

Since features recited by claims 1-5 and 7-15 are not taught by the cited art the rejection should be withdrawn.

### **No Motivation To Modify Haigh In A Manner As The Examiner Suggests**

Applicants further submit there is no motivation to modify Haigh to teach "both real-time and non-real-time" processes, as the Examiner contends.

The Examiner contends there is motivation to modify Haigh since Naoki "advance(s) the concept of differentiating between what can be considered real-time process request and what can be considered non-real time process request," and "using (F)lockhart's service-time objectives as a determination of process requests as real-time and non-real-time would highly enhance the performance of Haigh's system."

Applicants respectfully submit that that regardless of Naoki's *arguendo* teaching indicating what is real time or a non-real time transaction, one of ordinary skill in the art would not have been led to modify a transaction controller as discussed by Haigh to handle such differentiations.

Since there is no motivation to combine the art in a manner as the Examiner suggests, the rejection should be withdrawn.

### **Examiner's Contention Is Not Supported By Reference**

Further, Applicants submit the Examiner's contention regarding Flockhart that "(s)ervice-time objectives for a video call and a voice-only call represent differentiation between real-time and non-real time calls," is not supported.

Rather, Flockhart merely teaches (see, for example page 13 starting at line 16):

calls are assigned different priorities in a known manner based upon some predefined criteria such as, for example whether the caller is a unknown person, a regular account holder or a preferred customer. calls may likewise be assigned different priority based on the calls medium or media, e.g., video, voice-only, e-mail, etc.

That is, Flockhart's discussion does not teach a differentiation between real-time and non-real time calls, as the Examiner contends. For example, any of a text, a video and a voice message can present a real or a non-real time requirement based, for example, on whether they are sent as attachments to a document to be forwarded or as part of a chat room.

Since the Examiner's contentions are not supported, the rejection should be withdrawn.

### **Summary**

Since features recited by each of the independent claims are not taught by the cited art, alone or in combination, there is no motivation to modify the art in a manner the Examiner suggests, and the Examiner's contentions are not fully supported by the references, *prima facie* obviousness is not established, the rejection should be withdrawn and claims 1-5 and 7-15 allowed.

**CONCLUSION**

There being no further outstanding objections or rejections, it is submitted that the application is in condition for allowance. An early action to that effect is courteously solicited.

Finally, if there are any formal matters remaining after this response, the Examiner is requested to telephone the undersigned to attend to these matters.

If there are any additional fees associated with filing of this Amendment, please charge the same to our Deposit Account No. 19-3935.

Respectfully submitted,

STAAS & HALSEY LLP

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By: Paul W. Bobowiec  
Paul W. Bobowiec  
Registration No. 47,431

1201 New York Avenue, NW, 7th Floor  
Washington, D.C. 20005  
Telephone: (202) 434-1500  
Facsimile: (202) 434-1501